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10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12

13 United States of America  
14 Plaintiff  
15 v.  
16 \$200,000 in U.S. Currency,  
17 Defendant

18 Case No. 2:22-CV-7443-AB-PD

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20 **RESPONSE TO**  
21 **GOVERNMENT'S TRIAL BREIF**

22 Jury Trial: Feb. 27, 2024, 8:30 a.m.  
23 Courtroom 7B

24 On February 20<sup>th</sup>, 2024, Plaintiff United States of America filed a trial brief.  
25 ECF No. 90. Claimant Jasmol Sing hereby responds.

26 During the final pretrial conference, Plaintiff indicated that it would be calling  
27 its expert Peter Platt only to educate the jury as to “red flags” regarding suspicious  
28 bank activity, and not directly to accuse Claimant of money laundering, in order to  
limit Claimant’s ability to examine witnesses. The Court allowed Mr. Platt to remain  
on the witness list on this basis. The trial brief, however, asks to introduce this  
expert’s report as evidence, and that report unambiguously opines that “activity in  
[Claimant’s] Account[s] are indicative of money laundering.” Trial Brief, Ex. A, p.  
14, ¶ 19.

26 It is clear from the trial brief’s request and a review of the report that the  
27 government intends to use Mr. Platt to accuse – overtly or not – Claimant of money  
28 laundering. Claimant will not only ask the Court to deny any request to introduce

1 Mr. Platt's report as evidence, but will ask the Court to reconsider whether Mr. Platt  
2 may testify at all.

19 Dated: Los Angeles, CA  
20 February 21<sup>st</sup>, 2024

Respectfully submitted,

21 /s/Jonathan Corbett  
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